

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

<b>JOSEPH FOLEY and MELISSA FOLEY</b>	)	
Individually and as Personal Representatives of	)	
The Estate of JOSEPH PARKER FOLEY,	)	
Plaintiffs	)	C.A. NO. 1:21-CV-10615-ADB
VS.	)	
<b>JOHN BLAKE and DUXBURY PUBLIC</b>	)	
SCHOOLS,	)	
Defendants	)	

**INITIAL DISCLOSURES OF DEFENDANT, JOHN BLAKE, PURSUANT TO RULE  
26(a)(1)**

Now comes the defendant, John Blake, in the above numbered cause and in accordance with Rule 26(a)(1)(A)(i)-iv of the United States District Court within the District of Massachusetts hereby makes initial disclosure based on information that is presently available or known to counsel.

**A. Individuals likely to have discoverable information.**

1. Joseph Foley, 18 Winsor Street, Duxbury, MA 02332
2. Melissa Foley, 18 Winsor Street, Duxbury, MA 02332
3. Caroline Foley, Denver, CO
4. John Blake, 11 Short Street, Canton, MA 02021
5. Javae L. Carroll, 918 W. Osceola Avenue, St. Paul, MN 55015
6. Superintendent Dr. John J. Antonucci, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332

- KEVIN J. REDDINGTON • ATTORNEY AT LAW • 1342 BELMONT STREET • BROCKTON, MASSACHUSETTS 02301 • (508) 583-4280/(508) 580-6186
- 7. Assistant Superintendent Dr. Danielle E. Klingaman, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332
  - 8. Thom Holdgate, Director of Athletics & Wellness, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332
  - 9. Carrie Tarpey, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332
  - 10. Jack Stoddard, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332
  - 11. Carey Fryar, Duxbury Public Schools, 93 Chandler Street, Duxbury, MA 02332
  - 12. Dean Theophilos, MA, LCPC, The Mansio Center, 499 Anthony Street, Glen Ellyn, IL 60137

The identity of the named individuals as well as their relevance to the present case are known to counsel for the plaintiffs and defendants.

The defendant, John Blake, respectfully requests the right to supplement this list upon discovery or identification of additional individuals likely to have discoverable information.

#### **B. Documents, Data Compilations and Tangible Things**

Pursuant to Fed. R. Civ. P 26(a)(1)(A)(ii) the defendant, John Blake, states the following documents or types of documents are in the possession of the defendant.

- 1. Student records of Joseph Parker Foley
- 2. Personnel file of John Blake
- 3. Anonymous letter to Superintendent Dr. John Antonucci dated July 19, 2017
- 4. Report of Investigation of Complaint Against John Blake conducted by Attorney Regina Ryan referred to in this litigation as “Ryan Report”
- 5. Correspondence between Duxbury Public Schools and John Blake
- 6. Emails between Duxbury Public School and the plaintiffs.

**C. Damages**

Defendant, John Blake, has no information or documents pertinent to the issue of damages.

**D. Insurance Agreement**

Defendant, John Blake, has no insurance agreement that is available to the plaintiffs on this matter.

**CERTIFICATE OF SERVICE**

I, Kevin J. Reddington, Esq., hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on June 25, 2021.

INITIAL DISCLOSURES OF DEFENDANT, JOHN BLAKE, PURSUANT TO RULE 26(a)(1)

*/s/ Kevin J. Reddington*

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Kevin J. Reddington, Esq.